

LEE M. TESSER +×
STEVEN COHEN*°
STEPHEN PAUL WINKLES*
ROBERT E. BENNETT+
FRANCIS A. KIRK*
GINA A. MAKOUJY, LL.M.+
DANIELLE E. COHEN*
MATTHEW LAKIND*
STEVEN T. KEPPLER+



946 MAIN STREET
HACKENSACK, NEW JERSEY 07601

(201) 343-1100

FACSIMILE: (201) 343-0885

WRITER'S E-MAIL: SKEPPLER@TESSERCOHEN.COM

WWW.TESSERCOHEN.COM

NEW YORK OFFICE
30 WALL STREET
8TH FLOOR
NEW YORK, NEW YORK 10005-2205
(212) 226-1900
FACSIMILE: (201) 343-0885

* NY and NJ Bar
+ NJ Bar
× Mass. Bar
° Rule 1:40 Qualified Mediator

VIA ECF ONLINE SUBMISSION, ONLY:

October 7, 2024

Hon. Cathy L. Waldor, U.S. Mag. Judge
District of New Jersey, Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, New Jersey 07101

RE: A.M.E., Inc. v. T.R. Ricotta Electric, Inc., et al.
Case No.: 2:22-cv-05211 (EP)(CLW)
Our File No.: 1964-03

Dear Judge Waldor:

As Your Honor is aware, this office represents the Plaintiff, A.M.E., Inc., in connection with the above-named matter before the Court. Per the Court's Text Order (ECF No. 50), Plaintiff responds to the Defendant, T.R. Ricotta Electric, Inc.'s correspondence as follows:

Plaintiff will be producing the additional documents requested by the defendant this week, likely before the scheduled call on October 9, 2024. This discovery is largely comprised of native copies of information produced earlier in the discovery calendar.

That said, Plaintiff agrees that some party depositions remain to be taken, though they have been noticed and were rescheduled and then adjourned indefinitely, initially because T.R. Ricotta issued subpoenas to Turner Construction Co. and Harrand Electrical several months ago. A deposition of Kevin Harrand was conducted after Harrand produced documentation subject to the defendant's subpoena. However, to date we are not aware that Turner has cooperated with the defendant's subpoena or any action on behalf of the defendant to secure the documents they believe are required.

We further agree that depositions would be helpful ahead of settlement, and believe the Court's scheduled conference on October 9, 2024 is an excellent opportunity to finalize the discovery process and permit this matter to continue moving forward.

TESSER & COHEN

10/7/2024

Page 2 of 2

On behalf of A.M.E., Inc., we appreciate the Court's consideration of this correspondence. Should Your Honor need any additional information, I am at the Court's disposal.

Respectfully submitted,

TESSER & COHEN, P.C.

/s/ Steven Keppler

Steven T. Keppler

cc: All Counsel of Record *via ECF*
A.M.E., Inc. *via Electronic Mail*